

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR FINAL NO. F-05-014  
EARTHGRAINS BAKING COMPANIES, INCORPORATED  
OWENSBORO, KY  
FEBRUARY 24, 2006  
RITA ARGUELLO, REVIEWER  
SOURCE I.D. #: 021-059-00061  
SOURCE A.I. #: 899  
ACTIVITY #: APE20020001

**SOURCE DESCRIPTION:**

The source manufactures bread and buns. They submitted a request for permit renewal on September 19, 2002. Nothing has changed at the source since the time the previous permit was issued. The only significant change to the permit - aside from using the new template - is the addition of 401 KAR 61:020 requirements to the bread ovens. These requirements were inadvertently omitted from the original permit.

**PUBLIC AND U.S. EPA REVIEW:**

Public notice was placed in the MESSENGER-INQUIRER on May 20, 2005. The comment period ended on June 20, 2005. There were no comments from the public. There were no comments from U.S. EPA.

**COMMENTS:**

The source contains the following emission points, excluding insignificant activities:

**Emissions Unit 01 (EU-1) - Bread Oven**

Description:

Natural gas fired unit  
Oven Rated Capacity: 2.65 MMBTU/hr  
Construction commenced: 1970

Applicable Regulations:

401 KAR 52:030, Federally-enforceable permits for non-major sources.  
401 KAR 61:020, Existing process operations.

**Emissions Unit 02 (EU-2) - Bun Oven**

Description:

Natural gas fired unit  
Oven Rated Capacity: 2 MMBTU/hr  
Construction commenced: 1974

Applicable Regulations:

401 KAR 52:030, Federally-enforceable permits for non-major sources.  
401 KAR 61:020, Existing process operations.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

The applicant has requested a conditional major source permit that would be conditioned to limit total plant volatile organic compound (VOC) emissions to less than 100 tons per year to preclude Title V applicability.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.